

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

EDDIE HUMES, SR.

PLAINTIFF

V.

No. 4:20-cv-479-LPR

WHITE COUNTY, ARKANSAS, a Public
Body Corporate and Politic; PHILLIP MILLER,
In His Official Capacity as Sheriff of White County, Arkansas;
CLAYTON EDWARDS, In his Individual and Official
Capacity as Jail Administrator; LT. M. JONES and
S. GRAY, in their Individual and Official Capacities
as Sheriff Deputies of White County, Arkansas; and
NURSE HALL

DEFENDANTS

AFFIDAVIT OF SHAWNA CHASSITY HALL

Comes Shawna Chassity Hall, who, having been duly sworn, under oath, states that the following facts are true and correct to the best of her knowledge, information, and belief:

1. My name is Shawna Chassity Hall. I am over the age of 18, competent to testify, and have personal knowledge of the matters contained in this affidavit.
2. I am currently employed as a licensed practical nurse ("LPN") by Turn Key Health Clinics.
3. I began working for Turn Key in August 2019.
4. In October 2017, I was not employed by Turn Key and I did not work at the White County Jail. In fact, I have never worked at the White County Jail.
5. Since I was hired by Turn Key in August 2019, I have worked exclusively out of the Craighead County Jail in Jonesboro. The only other jail where I have worked

EXHIBIT A

was the Benton County Jail from November 2017 to March 2018, when I was employed by Southern Health Partners. From March 2018 to August 2019, I worked at the Baxter Regional Medical Center in Mountain Home.

6. I did not provide care for or have any involvement with the inmate, Eddie Humes, in October 2017 at the White County Jail.

7. I was served with the complaint and summons on September 29, 2020.

Further affiant sayeth not,

Shawna Chassity Hall
SHAWNA CHASSITY HALL

STATE OF Arkansas)
COUNTY OF Craighead) ss.

SUBSCRIBED AND SWORN to before me, a notary public, this 19 day of November, 2020.

Tammy H. Willard
NOTARY PUBLIC

My Commission Expires:

1/20/30

(SEAL)

Tammy H. Willard
Notary Public, State of Arkansas
Commission # 12374833
Qualified in Craighead County
Commission Expires January 20, 2030